





Relator is represented in this lawsuit by Andrew B. Stephens and Heather G. Hacker of Hacker Stephens LLP in Austin, Texas. Mr. Stephens has been admitted to practice before this Court since 2012. Mr. Stephens is a former Texas Assistant Attorney General and has represented clients as lead counsel in numerous matters in the Northern District of Texas and other Texas federal district courts. Ms. Hacker is a former Texas Assistant Solicitor General and is admitted to practice before this Court. Ms. Hacker has represented the State of Texas in matters before Texas federal district courts, the Fifth Circuit Court of Appeals, and the United States Supreme Court. Mr. Stephens and Ms. Hacker are familiar with the Local Rules of this Court and are available to travel to Amarillo on short notice to appear and argue the client's position at any hearings called by the Court and to perform any duty required by the Local Rules.

Because this is a *qui tam* lawsuit brought on behalf of the United States and the states of Texas and Louisiana, the federal and the state governments may intervene and be represented by attorneys appearing on behalf of the United States Department of Justice or the Attorneys General of Texas and Louisiana. *See* 31 U.S.C. §§ 3729 *et seq.*, Tex. Hum. Res. Code §§ 36.001 *et seq.*, La. Rev. Stat. §§ 46:437.1 *et seq.* Because attorneys appearing on behalf of the Department of Justice and the state Attorneys General are exempt from the local counsel requirement, extending the same treatment to Relator will not cause any additional delay and will not detract from the Local Rules' purpose of facilitating the scheduling of hearings on short notice. *See* N.D. Tex. R. 83.11. Finally, requiring Relator to hire local counsel would

unnecessarily increase the cost of litigating this case, and given the exemption for the potential government parties and the distance that is likely to be travelled by the defendants' anticipated counsel, such an additional financial burden would not be in the interest of justice.

WHEREFORE, Relator respectfully requests that the Court enter an order granting Relator leave to participate in this matter without local counsel as required by Local Rule 83.10(a).

Respectfully submitted.

/s/ Andrew B. Stephens

ANDREW B. STEPHENS

Texas Bar No. 24079396

andrew@hackerstephens.com

HEATHER GEBELIN HACKER

Texas Bar No. 24103325

heather@hackerstephens.com

HACKER STEPHENS LLP

108 Wild Basin Rd. South, Suite 250

Austin, Texas 78746

(512) 399-3022 (phone)

Attorneys for Relator Alex Doe

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record via U.S. mail, in accordance with the Federal Rules of Civil Procedure.

/s/ Andrew B. Stephens  
ANDREW B. STEPHENS

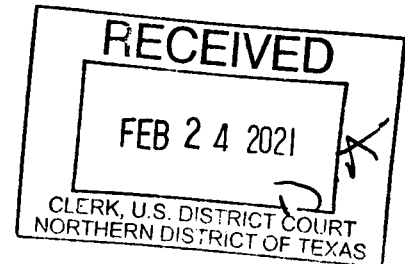
# HACKERSTEPHENS<sub>LLP</sub>

ANDREW B. STEPHENS  
Partner

M (512) 569-0543  
Andrew@HackerStephens.com

February 22, 2021

United States District Clerk  
United States District Court  
205 SE 5th Avenue, Room 133  
Amarillo, Texas 79101



**Via UPS**

Re: **[SEALED]** *United States of America ex rel. Alex Doe, Relator, et al. v. Planned Parenthood Federation of America, Inc., et al.*; Civil Action No. 2-21CV-022-Z; United States District Court for the Northern District of Texas, Amarillo Division

Dear District Clerk:

Please file in camera and under seal the enclosed Motion for Leave to Proceed Without Local Counsel in the above-referenced case. Pursuant to the Local Rule 5.1(b) a judge's copy of the Motion is also enclosed.

The proposed order in Word format will be emailed to Kacsmaryk\_Orders@txnd.uscourts.gov as required by Local Rule 7.1 and Judge Kacsmaryk's specific requirements for submission of proposed orders.

Kindly return a file stamped copy of the document to my email listed above at your earliest convenience. Please contact me if you have any questions or need additional information.

Thank you very much for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew B. Stephens".

Andrew B. Stephens

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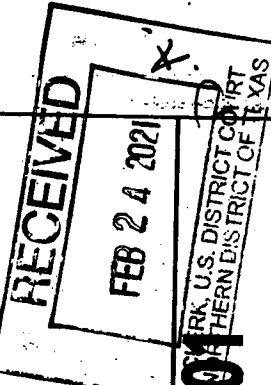
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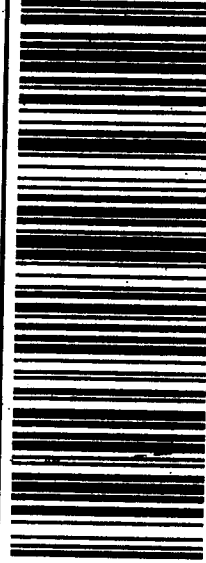


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